

From: Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov
Subject: RE: [EXTERNAL] Re: OneTaste - Employment Agreements
Date: April 13, 2023 at 12:22 PM
To: Paul Pelletier pepelletier3@gmail.com
Cc: Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov

Thank you, Paul.

From: Paul Pelletier <pepelletier3@gmail.com>
Sent: Thursday, April 13, 2023 2:52 PM
To: Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>
Cc: Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>
Subject: [EXTERNAL] Re: OneTaste - Employment Agreements

Gillian,

We responded to requests #6 and 10 of the February 21 subpoena in an email dated March 6. Because One Taste doesn't maintain lists of current employees as requested, we attempted to assist in giving you those answers with respect to the list of individuals that you were seeking copies of the video taped interviews in that email. Further, as I also explained in that email, we have also perviously produced lists of OneTaste employees, or documents regarding OneTaste employees, in the following manner:

- On May 28, 2021 in response to the subpoena issued February 9, 2021, item #15 for organizational charts;
- On July 13, 2022 in a voluntary production in response to a request made on June 15, 2022 for employment records of a number of named individuals.
- On August 26, 2022 in a voluntary production in response to a request made on July 28, 2022 for employment records of a number of named individuals.
- On August 30, 2022 in a voluntary production in response to a request made on July 28, 2022 for employment records of a number of named individuals.
- On October 24, 2022 in a voluntary production in response to a request made on September 21, 2022 for communications concerning Nicole's Daedone's departure from OneTaste.
- On January 30, 2023 in a voluntary production in response to a request made on December 14, 2022 for employee time logs.

As it relates to your request for that we voluntarily produce additional information related to this request, namely for "all agreements for OneTaste current/former employees, contractors, volunteers or members," first made on March 24 we intend to supply this information without the need for you to issue a new subpoena. We have, as we hope you can understand, prioritized responding to the subpoena we received on February 21, 2022, over responding to additional voluntary requests. Right now we are working on responding to subpoena item #7, and hope to have our response to you by Monday April 17. After that production is complete, we would happy to re-prioritize this voluntary production ahead of other subpoena responses.

Given the duration of OneTaste's operation, its multiple locations and the fact is that the records this request entails are not centrally organized, we believe we can sort and provide to you these records

request entails are not centrally organized, we believe we can sort and provide to you these records (understood to be a substantial amount of data) by the following Friday April 21.

Please let me know if you have any questions or wish to discuss any of this information further. PEP

Paul E. Pelletier
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